

# EXHIBIT

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**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN) ECF Case

**DECLARATION OF VICTOR D. PANZELLA, JR.**

I, Victor D. Panzella, Jr., pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based on my personal knowledge unless otherwise indicated.

2. I was a citizen of the United States on September 11, 2001, and remain so today. Attached as Exhibit A to this Declaration is a true and correct copy of my proof of citizenship.

3. On September 11, 2001, I was present in New York City when the terrorist attacks of the World Trade Center Towers occurred. At the time of these horrific attacks, I was the Chief of Ambulance Services at St. Vincent Medical Center on Staten Island.

4. After the first passenger jet struck the North Tower, the emergency response team at St. Vincent's responded to the World Trade Center area at approximately 9:45 a.m. My team that traveled to the World Trade Center to assist the injured included a large number of paramedics, emergency medical technicians, and a total of five ambulances. By the time we arrived in the area, the South Tower had already collapsed and I was present at the scene when the North Tower and other buildings collapsed.

5. When the building located at 7 World Trade Center collapsed, a crowd of people began to run away from the area and I also began to run while trying to escape the debris from the falling tower. As I ran toward the area where many of the civilians had gathered while trying to escape, I fell and severely injured my left knee as I climbed over a hedge row. I became engulfed in the large cloud of dust and building debris that covered the area around the collapsing buildings. I inhaled large amounts of debris in my lungs and airways, and my eyes were also exposed to the toxic dust. But I disregarded my injuries as I devoted my efforts to helping other victims to escape from the area.

6. As an emergency responder, I worked late into the evening of 9/11 while treating firefighters and police officers who had also suffered eye and respiratory injuries. At approximately 11:00 pm, I went to St. Vincent's Hospital, and I received treatment from doctors and hospital personnel for my injured left knee, my respiratory injuries, and the irritation to my eyes and throat caused by my exposure to the building debris from the collapsed World Trade Center Towers.

7. As a result of these terrorist attacks, I suffered the following specific injuries on September 11, 2001: a significant injury to the meniscus and cartilage in my left knee, which later required surgery on April 3, 2003 to repair<sup>1</sup>; severe respiratory injuries and exposure injuries related to the debris and toxins I inhaled<sup>2</sup>, including COPD<sup>3</sup>, allergic rhinitis<sup>4</sup>, asthma<sup>5</sup>, respiratory

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<sup>1</sup> See, Medical Records of Victor D. Panzella, Jr., (PANZELLA\_MEDS\_000001), attached hereto as Exhibit B at 0001, 0003-0005, 0008-0010, 0017-0020, and 0022-0027.

<sup>2</sup> *Id.* at 0017-0020, and 0030.

<sup>3</sup> *Id.* at 0006-0007, 0012, 0017-0020, 0027, 0030, and 0034.

<sup>4</sup> *Id.* at 0030.

<sup>5</sup> *Id.* at 0006-0007, 0012, 0017-0020, and 0030-0032.

airway disorder, eye irritation<sup>6</sup>, throat irritation<sup>7</sup>, chronic obstructive bronchitis<sup>8</sup>; and, World Trade Center syndrome<sup>9</sup>.


8. I further suffered, and continue to suffer, severe emotional distress as a result of these terrorist attacks. I suffered and continue to suffer from anxiety and bouts of depression due to these traumatic events almost daily, triggered by certain smells, sounds and views. I have been diagnosed with a major depressive disorder with recurrence, post-traumatic stress disorder, and anxiety disorder.<sup>10</sup> The horrific events that I witnessed on 9/11 directly caused all of the above conditions, which continue to this day. I have been deemed totally disabled by both the New York City Fire Department EMS and the Social Security Administration.

9. I sought and continue to seek medical attention on a monthly basis for my injuries caused by these terrorist attacks. Attached as Exhibit B to this Declaration is a true and correct copy of my select relevant medical records related to the treatment that I received for my physical and emotional injuries following the September 11, 2001 terrorist attacks.

10. I previously pursued a claim through the Victim Compensation Fund (VCF No. 212-003925) specifically related to my physical injuries incurred on September 11, 2001, and my claim was determined to be eligible for compensation.

I DECLARE, VERIFY AND STATE UNDER PENALTY OF PERJURY that the foregoing is true and correct.

DATED this 11 day of October 2021.

  
Declarant Víctor D. Panzella, Jr.

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<sup>6</sup> *Id.* at 0001, and 0003-0005.

<sup>7</sup> *Id.* at 0001.

<sup>8</sup> *Id.* at 0006-0007, 0012, 0017-0020, 0031-0032.

<sup>9</sup> *Id.* at 0006-0007, 0012, 0017-0020, 0031-0032.

<sup>10</sup> *Id.* at 0013-0016, 0021, 0027, 0033-0034.

**EXHIBITS  
FILED  
UNDER SEAL  
(ECF No.  
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